

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

THOMSON REUTERS ENTERPRISE
CENTRE GMBH and WEST PUBLISHING
CORPORATION,

Plaintiffs/Counterdefendants,

v.

ROSS INTELLIGENCE INC.,

Defendants/Counterclaimant.

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C.A. No. 20-613-SB

JURY TRIAL DEMANDED

PUBLIC VERSION

**DECLARATION OF MARK A. KLAPOW IN SUPPORT
DEFENDANT/COUNTERCLAIMANT ROSS INTELLIGENCE INC.'S REPLY BRIEFS
IN SUPPORT OF ITS MOTIONS TO EXCLUDE PLAINTIFFS' EXPERTS**

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Dated: February 13, 2023
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Public Version Dated: February 24, 2023

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HIGHLY CONFIDENTIAL

FILED UNDER SEAL

**DECLARATION OF MARK A. KLAPOW IN SUPPORT
DEFENDANT/COUNTERCLAIMANT ROSS INTELLIGENCE INC.'S REPLY BRIEFS
IN SUPPORT OF ITS MOTIONS TO EXCLUDE PLAINTIFFS' EXPERTS**

I, Mark A. Klapow, declare as follows:

1. I am a partner at Crowell & Moring, LLP, lead counsel of record for ROSS Intelligence, Inc. I am an attorney, admitted to the New York, Connecticut, and District of Columbia Bars and have been admitted *pro hac vice* with this Court. I submit this Declaration in support of Defendant/Counterclaimant ROSS Intelligence Inc.'s ("ROSS") Reply Briefs In Support of It's Motions to Exclude the Opinions and Testimony of Plaintiff/Counterdefendants Thomson Reuters Enterprise Centre GmbH and West Publishing Corporation's ("Plaintiffs") Expert Jonathan L. Krein and ROSS's Motion to Exclude Two Opinions of Plaintiffs' Expert James Malackowski.

2. A true and correct copy of excerpts from the Deposition Transcript of Laurie Oliver (Mar. 30, 2022) is attached to this declaration as **Exhibit 17**.

3. A true and correct copy of excerpts from the Deposition Transcript of Mark Hoffman (Mar. 16, 2022) is attached to this declaration as **Exhibit 18**.

4. A true and correct copy of Thomson Reuters Corporation's Form 40-F, Annual Report Pursuant to Section 13(a) or 15(d) of the Securities Exchange Act of 1934 for the Fiscal Year Ended December 31, 2020, filed with the United States Securities and Exchange Commission on March 10, 2021 is attached to this declaration as **Exhibit 19**.

5. A true and correct copy of excerpts from the Deposition Transcript of Jonathan Krein (Oct. 22, 2022) is attached to this declaration as **Exhibit 20**.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed at Washington, D.C. on February 13, 2023.

/s/ Mark A. Klapow

Mark A. Klapow